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1 2 3 4 5 6	Nicholas A. Trutanich United States Attorney District of Nevada Nevada Bar Number 13644 Robert A. Knief Assistant United States Attorney 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 Telephone: (702) 388-6336 Robert.Knief@usdoj.gov Counsel for Plaintiff United States		
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA -000-		
9		J.	
	UNITED STATES OF AMERICA,	Case No.: 2:15-CR-00195-GMN-DJA	
10	Plaintiff,	STIPULATION TO EXTEND	
11	VS.	<u>DEADLINE</u> (First Request)	
12	TONIQUEWA BALLARD,		
13	Defendant.		
14			
15	IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas Trutanich,		
16	United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the		
17	United States of America, and Erin Gettel, cour	nsel for defendant Toniquewa Ballard, that the	
18	deadline for the filing of the government's response to the defendant's Sentencing		
19	Memorandum (ECF No. 83), be extended one day to May 29, 2020.		
20	This stipulation is entered into for the following reasons:		
21	1. Defense timely filed its Sentencing Memorandum at 11:11 p.m. on May 26,		
22	2020, five business day before the sentencing hearing.		
23	2. On May 27, 2020, government counsel was out of the office for medical reasons.		
24	3. The Government's response was due on May 28, 2020, however due to counsel's		

1	absence from the office there has been insufficient time to prepare a response.				
2	4. Defendant is in custody and does not object to the extension.				
3	5. For the reasons stated above, the ends of justice would best be served by a				
4	extension of the government deadline.				
5	6. This is the first request for an extension filed herein.				
6	DATED this 29th day of May 2020.				
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9	Nicholas A. Trutanich				
10	United States Attorney				
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13	/s/ Erin Gettel /s/ Robert Knief				
14	ERIN GETTEL ROBERT KNIEF Counsel for Defendant Assistant United States Attorney				
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2	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA -000-			
3	UNITED S	TATES OF AMERICA, Plaintiff,	Case No.: 2:15-CR-00195-GMN-DJA	
5		VS.	ORDER TO EXTEND DEADLINE	
6	TONIQUEWA BALLARD,			
7		Defendant.		
8				
9	<u>FINDINGS OF FACT</u>			
10	Based upon the pending Stipulation of counsel, and good cause appearing therefore, the			
11	Court finds that:			
12	1. Defense timely filed its Sentencing Memorandum at 11:11 p.m. on May 26, 2020,			
13	five business day before the sentencing hearing.			
14	2. On May 27, 2020, government counsel was out of the office for medical reasons.			
15	3.	3. The Government's response was due on May 28, 2020, however due to counsel's		
16	absence from the office there has been insufficient time to prepare a response.			
17	4. Defendant is in custody and does not object to the extension.			
18	5. For the reasons stated above, the ends of justice would best be served by an			
19	extension of the government deadline.			
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ORDER It is therefore ORDERED that the Government's response to defendant's Sentencing memorandum (ECF No. 83), is due on the 29th day of May 2020. DATED this 29 day of May, 2020. Gloria M. Navarro, District Judge UNITED STATES DISTRICT COURT